1 2 3 4	ISMAIL J. RAMSEY (CABN 189820) United States Attorney MICHELLE LO (NYRN 4325163) Chief, Civil Division ADRIENNE ZACK (CABN 291629) Assistant United States Attorney		
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7 8	Attorneys for Federal Defendants The Presidio Trust and the United States		
9	UNITED STATES DISTRICT COURT		
0	NORTHERN DISTRICT OF CALIFORNIA		
1	SAN FRANCISCO DIVISION		
12	JAMES BREGAN, et al.,) CASE NO. 3:23-CV-1823-LB	
13	Plaintiffs,)) STIPULATION TO EXTEND MOTION TO) DISMISS BRIEFING SCHEDULES AND	
15	v. THE JOHN STUART COMPANY, et al.,) CONTINUE CASE MANAGEMENT) CONFERENCE	
16	Defendants.)	
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18	Subject to the Court's approval, Plaintiffs, Defendant Enterprise Roofing Service ("Enterprise"),		
9	9 and Defendants the Presidio Trust, Mark Feickert, Van Cornwell, and the United States ("Federal		
20	Defendants"), through their undersigned counsel of record, hereby stipulate as follows:		
21	1. Plaintiffs will file their response(s) to Enterprise's Motion to Dismiss, ECF No. 15, and		
22	Federal Defendants' Motion to Dismiss, ECF No. 17, by July 27, 2023.		
23	2. Enterprise and Federal Defendants will file their replies in support of their respective		
24	Motions to Dismiss by August 10, 2023.		
25	3. A hearing will be held on August 24, 2023, at 9:30 a.m.		
26	Additionally, pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action hereby		
27	stipulate and request that the Court continue the Case Management Conference currently set for August		
28	LOC TEC IMPORTS CLASS	. CMC	
	Jt. Stip. To Extend MTD Briefing Sched. & Cont. CMC Case No. 3:23-cy-1823-LB		

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3, 2023, see ECF No. 11, and all associated deadlines, until September 14, 2023, at 11:00 a.m. 2 The parties request this change to the briefing schedule to accommodate counsel's previously 3 scheduled vacation and to the Case Management Conference date because Enterprise and Federal Defendants' motions to dismiss are likely to remain pending on August 3, and the parties respectfully 5 suggest that a case management conference will be more productive after the pleadings are settled. 6 This is the parties' third joint request to modify the schedule in this case. See Declaration of 7 Adrienne Zack ¶ 3. The requested modification will not impact the schedule for the case because no 8 further schedule has yet been set and because this matter is still in its initial stages. Zack Decl. ¶ 4. 9 10 DATED: June 23, 2023 Respectfully submitted, 11 ISMAIL J. RAMSEY /s/ Gregory J. Brod! United States Attorney GREGORY J. BROD 12 Brod Law Firm, P.C. <u>/s/ Adrienne Za</u>ck 13 ADRIENNE ZACK Attorney for Plaintiffs Assistant United States Attorney 14 15 Attorneys for the Federal Defendants /s/ David S. Webster¹ 16 DAVID S. WEBSTER NANCY A. MCPHERSON 17 Wood Smith Henning & Berman LLP 18 Attorneys for Defendant Enterprise Roofing 19 Services 20 21 22 23 24 25 26 27 ¹ In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of 28 perjury that all signatories have concurred in the filing of this document.

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Jt. Stip. To Extend MTD Briefing Sched. & Cont. CMC

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ORDER AS MODIFIED

Pursuant to stipulation, IT IS SO ORDERED.

- 1. Plaintiffs will file their response(s) to Enterprise's Motion to Dismiss, ECF No. 15, and Federal Defendants' Motion to Dismiss, ECF No. 16, by July 27, 2023.
- 2. Enterprise and Federal Defendants will file their replies in support of their respective Motions to Dismiss by August 10, 2023.
- 3. A hearing will be held on August 24, 2023, at 9:30 a.m.

The Initial Case Management Conference is continued until October 12, 2023, at 11:00 a.m.

DATED: June 29, 2023

THE HON. LAUREL BEELER United States Magistrate Judge

Jt. Stip. To Extend MTD Briefing Sched. & Cont. CMC Case No. 3:23-cv-1823-LB